

REMARKS

This paper is responsive to any paper(s) indicated above, and is responsive in any other manner indicated below.

PENDING CLAIMS

Claims 1-9 were pending, under consideration and subjected to examination in the Office Action. Appropriate claims have been amended, canceled and/or added (without prejudice or disclaimer) in order to adjust a clarity and/or focus of Applicant's claimed invention. That is, such changes are unrelated to any prior art or scope adjustment and are simply refocused claims in which Applicant is present interested. At entry of this paper, Claims 1-9 will be pending for further consideration and examination in the application.

CLAIM OBJECTIONS OBVIATED VIA CLAIM AMENDMENT

Claim 3 has been objected to because of the Office Action concerns listed within the "Claim Objections" section on page 2 of the Office Action. As amendments have been made where appropriate in order to address each of the Office Action listed concerns, reconsideration and withdrawal of the claim objection are respectfully requested.

'101 REJECTION - USEFUL, CONCRETE AND TANGIBLE RESULT

Claims 1-9 have been rejected under 35 USC 101, based on an allegation that such claims fail to provide a useful, concrete and tangible result. Applicant traverses, but respectfully submits that appropriate ones of the rejected claims have been rewritten and definitively include a further useful, concrete and tangible result in accordance with the Examiner's kind suggestions. Based upon the foregoing, reconsideration and withdrawal of the '101 rejection are respectfully requested.

REJECTIONS UNDER 35 USC '102 - TRAVERSE

The 35 USC '102 rejection of claims 1, 7 and 8 as being anticipated by Tanaka et al. (U.S. Patent 6,823,168) are respectfully traversed.

In order to properly support a '102 anticipatory-type rejection, any applied art reference must disclose each and every limitation of any rejected claim. The applied art does not adequately support a '102 anticipatory-type rejection because, at minimum, such applied art does not disclose (or suggest) the following discussed limitations of Applicant's claims.

All descriptions of Applicant's disclosed and claimed invention, and all descriptions and rebuttal arguments regarding the applied prior art, as previously submitted by Applicant in any form, are repeated and incorporated hereat by reference. Further, all Office Action statements regarding the prior art rejections are respectfully traversed. As additional arguments, Applicant respectfully submits the following traversal comments from Applicant's foreign patent representative.

One feature of Applicant's invention is in **“changing a batch of said I/O-enable/disable information on each host-computer basis in accordance with said access-right change commands from said host computers”** recited in claim 1, as well as in claims 7 and 8. That is, in response to the access-right change command from the host computers, the I/O-enable/disable information concerning a plurality of host computers (different paths) are changed or revised all together at a time in batch processing by the disk device. This is an important point of Applicant's invention, and is explained, for example, in the description in page 24, line 15 to page 26, line 21 of the specification, referring to Fig. 10.

Office Action comments have alleged that Tanaka et al. teaches this feature, i.e., “changing a batch of said I/O-enable/disable information on each host-computer basis in accordance with said access-right change commands from said host computers” in claim 1, in column 8, lines 29-59. Applicant respectfully cannot agree to such allegation, in that the description in column 8, lines 29-59 of Tanaka et al only concerns an Exclusion/Priority Control Table shown in Fig. 6. Tanaka et al. does not teach that in response to the access-right change command from the host computers, the I/O-enable/disable information (an Exclusion/Priority Control Table) concerning a plurality of host computers (WWN#0-WWN#3) are changed or revised all together at a time in batch processing by the disk device. More particularly, according to the description in column 8, lines 60 to column 9, line 29 of Tanaka et al, the data of the exclusive/priority control table is changed **for one access path at a time**, i.e., the same as the method of “PERSISTENT RESERVE” referred in page 3 of Applicant's specification.

In addition to Applicant's foreign patent representative's remarks, the following additional remarks are submitted by the Undersigned. More particularly, Tanaka et al.'s FIG. 7 example SNMP message structure tends to show that a message instructs change with respect to a specific logical volume, LPAR-ID and WWN, i.e., again see column 8, lines 60 to column 9, line 29 of Tanaka et al, and especially column 9, lines 23-25. Accordingly, it is respectfully submitted that Tanaka et al.'s arrangement would not have disclosed, or suggested, "**changing a batch of said I/O-enable/disable information on each host-computer basis in accordance with said access-right change commands from said host computers**" as recited in Applicant's independent claim 1, as well as in independent claims 7 and 8.

In addition to the above, it is respectfully noted that independent claim 1, for example, may be rewritten, or read, as shown on the following page:

1. (Possible Reading/Amendment) A method of controlling enablement/disablement of I/O requests from plural host computers to a disk device, said method comprising:

in said host computers,

transmitting access-right change commands to said disk device, said access-right change commands including one piece or plural pieces of information having I/O-enable/disable information and host identification information to correspond to each other in a one-to-one correspondence manner, said I/O-enable/disable information indicating whether or not said disk device will execute said I/O requests from said host computers, said host identification information identifying said respective host computers, and

issuing, to said disk device, said I/O requests to which said host computers have added said host identification information; and

in said disk device,

changing a batch of said I/O-enable/disable information ~~on-in a batch basis for each~~ in accordance with said access-right change commands from said host computers, and storing and holding said I/O-enable/disable information in an access-right management table,

identifying request-source host computers in response to said I/O requests from said host computers, and,

based on said host identification information and said I/O-enable/disable information held in said access-right management table, ~~determining to enable or disable~~ enabling or disabling said I/O requests to be executed ~~on-in a batch basis for each host-computer's node,~~ basis.

If the above proposed reading/amendment would further clarify the claims so as to move the claims to allowance, the Examiner is respectfully requested to contact the Undersigned at the local Washington, D.C. telephone number of 703-312-6600.

As a result of all of the foregoing, it is respectfully submitted that the applied art would not support a '102 anticipatory-type rejection of Applicant's claims. Accordingly, reconsideration and withdrawal of such '102 rejections, and express written allowance of all of the rejected claims, are respectfully requested. Further, at this point, it is respectfully submitted as a reminder that, if new art is now cited against any of Applicant's unamended claims, then it would not be proper to make a next action final.

EXAMINER INVITED TO TELEPHONE

The Examiner is herein invited to telephone the undersigned attorneys at the local Washington, D.C. area telephone number of 703/312-6600 for discussing any Examiner's Amendments or other suggested actions for accelerating prosecution and moving the present application to allowance.

RESERVATION OF RIGHTS

It is respectfully submitted that any and all claim amendments and/or cancellations submitted within this paper and throughout prosecution of the present application are without prejudice or disclaimer. That is, any above statements, or any present amendment or cancellation of claims (all made without prejudice or disclaimer), should not be taken as an indication or admission that any

objection/rejection was valid, or as a disclaimer of any scope or subject matter. Applicant respectfully reserves all rights to file subsequent related application(s) (including reissue applications) directed to any/all previously claimed limitations/features which have been subsequently amended or cancelled, or to any/all limitations/features not yet claimed, i.e., Applicant continues (indefinitely) to maintain no intention or desire to dedicate or surrender any limitations/features of subject matter of the present application to the public.

CONCLUSION

In view of the foregoing amendments and remarks, Applicant respectfully submits that the claims listed above as presently being under consideration in the application are now in condition for allowance.

To the extent necessary, Applicant petitions for an extension of time under 37 CFR '1.136. Authorization is herein given to charge any shortage in the fees, including extension of time fees and excess claim fees, to Deposit Account No. 01-2135 (Case No. 500.44934X00) and please credit any excess fees to such deposit account.

Based upon all of the foregoing, allowance of all presently-pending claims is respectfully requested.

Respectfully submitted,

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